

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of:)	
)	
Broadcast Localism)	MB Docket No. 04-233
)	

Comments of the Ohio Farm Bureau Federation

Pursuant to 47 C.F.R. §§ 1.415 and 1.419, the Ohio Farm Bureau Federation (OFBF) submits these comments in response to the FCC's Notice of Inquiry released July 1, 2004 concerning Broadcast Localism, specifically paragraphs 13 through 15.

Because our organization's policy encourages radio stations to "maintain and improve their agricultural services," OFBF welcomes the opportunity to join the American Farm Bureau Federation and other state Farm Bureaus in responding to the Commission's questions regarding the influence of market forces on the quantity and quality of local broadcast programming.

Few audiences, if any, are as dependent on local programming as the farm community. Farmers require very geographically specific information regarding commodity prices, weather forecasts, production practices and public affairs. Until recently farmers could rely on farm broadcasters in or near their community to provide this highly localized information. However, market forces now are reducing –and in some cases eliminating – farm broadcasting as a valuable local resource for farmers.

The primary market force that has hurt farm broadcast service is consolidation in station ownership. Owners who control programming on many stations save costs by having fewer employees dedicated to farm programs. Instead of multiple farm reporters at several stations each serving a local market, the consolidated owner now has one reporter programming many stations across large geographies. This is the antithesis of local service. Consolidation in agribusiness has impacted farm broadcasting as well. Due to fewer farm-input suppliers, and fewer products to market, farm radio revenue has fallen 45 percent in the past five years.

Ohio offers an example of the decline in broadcast service to farmers. Since 1998, Ohio has lost one-half of its full-time professional farm broadcasters. Veteran broadcasters are being replaced by inexperienced personnel. The surviving farm reporters are being directed by management to devote fewer hours to their farm broadcast duties. Approximately 10 percent of the stations which carried farm programs just five years ago no longer do so. The state's most widely heard farm station has cut its programming by one-third. These trends have resulted in Ohio farmers losing relevant,

portable and accurate sources of vital information, sources which no other medium provides.

Consumers too are losing a valuable resource. Ohio is a large farming state, but it is also highly populated. More than 11 million people live virtually next door to Ohio's 78,000 farms. The loss of farm radio programming eliminates their access to a very unique perspective on issues such as food safety, environmental protection and public policy. The loss is magnified by the fact that agriculture is Ohio's largest industry, accounting for 1 in 7 jobs in the \$80 billion supply, production, processing and distribution sectors. With fewer farm broadcasts, these farm-related workers lose access to important information about their economic engine.

The Commission has asked whether market forces in and of themselves have encouraged broadcasters to air "community-responsive programming." Applied to the farm community, the answer appears to be no. If steps are taken to encourage improved local broadcast service, Ohio Farm Bureau encourages the Commission to recognize and respond to the needs of the agricultural community.

Sincerely,

John C. (Jack) Fisher, Executive Vice President
Ohio Farm Bureau Federation

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